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Comments: [External Email]National Land Management Plan Amendment Must Protect Mature & Old-Growth Forests

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Dear Randy Moore,

Dear Chief Moore & Director Walker,

Thank you for starting a process that we hope will protect old-growth forests and trees across the U.S., and increase abundance and distribution of future old-growth. I, the undersigned, am among millions of Americans who care deeply about mature and old-growth trees and forest conservation across all national forests.

Severe biodiversity loss and worsening climate change impacts require solutions that match the threats' magnitude. We need transformational change, and, done right, the proposed nationwide forest plan amendment could have meaningful, near-term impacts on the climate and biodiversity crises. We look forward to seeing this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old-growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

We also need provisions to avoid reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected. The amendment should have definitions that are fully inclusive of all old-growth conditions, simple, and easily operationalized in the field.

And, we encourage you to consider alternatives for conserving the values of mature forests, including their value as future old-growth. National forests in certain geographic areas, for example national forests east of the 100th meridian, have virtually no old-growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be managed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.

The national forest plan amendment must also incorporate strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and ensuring their value as a natural carbon sink is optimized over time.

Thank you for the opportunity to provide feedback on this important effort. Given the outstanding role mature and old-growth trees and forests play in fighting the climate and biodiversity crises, America needs to establish the strongest possible safeguards for their conservation. We encourage the Forest Service to maintain its timeline for

this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.

Sincerely,

Sincerely,  
Hilarie Ericson  
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